Remarks/Arguments:

Reconsideration of the application is requested.

Claims 1-9 remain in the application.

In the third paragraph on page 2 of the above-identified Office action, claims 1, 4, 5, and 7-9 have been rejected as being fully anticipated by Notredame (U.S. Patent No. 6,049,390) under 35 U.S.C. § 102.

As will be explained below, it is believed that the claims were patentable over the cited art in their original form and the claims have, therefore, not been amended to overcome the references.

Before discussing the prior art in detail, it is believed that a brief review of the invention as claimed, would be helpful.

Claims 1 and 7 call for, *inter alia*:

storing the raster data column by column in a raster memory with random access while being generated by the raster processor.

On page 6 of the Office action, the Examiner stated that that Notredame discloses a raster image processor (RIP system 1009) for generating raster data from raw image data.

The Examiner alleges on pages 7 and 8 that Notredame discloses that the memory in the rapid merge system (1003) is part of the RIP system (1009). In support thereof, the Examiner refers to Fig. 10 and the corresponding part of the description. As will be seen from the following remarks, the Examiner's allegation is not accurate.

The RIP system (1009) is described in column 10 to column 13 of Notredame. Then, on line 65 of column 13 of Notredame the description of the rapid merge system (1003) begins. Notredame discloses that the rapid merge system (1003) consists of a computer system (110), which is also shown in Fig. 1. The computer system includes a random access memory (130) and a hard disc (146) (column 14, line 63 and column 15, line 20). This disclosure alone shows that the rapid merge system (1003) and the RIP system (1009) are not the same computer system. It is also disclosed in Fig. 10 that the rapid merge system (1003) and the RIP system (1009) are not the same computer system. Fig. 10 shows that two RIP systems (1009) are provided which are both connected to a common rapid

merge system (1003). The Examiner ignores that according to the footnote of Fig. 10, page element descriptions are the input data of the RIP systems (1009) whereas compressed raster images are the output data of the RIP system (1009). Therefore, the output data which are then the input data of a rapid merge system (1003) are already compressed to raster images.

These compressed raster images are already stored in form of a file (column 13, lines 48 to 50). The file including all the data for any single page element is sent to the rapid merge system (1003). This is only possible, if a file including the raster data already exists outside the rapid merge system (1003), because otherwise such a file cannot be sent to the rapid merge system (1003). Accordingly, the RIP systems (1009) must already produce a file including the compressed raster images before being sent to the rapid merge system (1003). Since this file is produced outside the rapid merge system (1003) in the RIP system (1009), the memory of the rapid merge system (1003) cannot be considered to be the location and storage wherein the raster image data are generated. Therefore, it is respectfully noted that the Examiner's allegations that the memory in the rapid merge system (1003) is part of the RIP system (1009), are not accurate.

Moreover, claims 1 and 7 of the instant application are directed to the raster data generation process, which, in Notredame, is done in the RIP systems (1009) and not in the rapid merge system (1003) thereof. Therefore, the prior art in Notredame, which is described as being part of the rapid merge system (1003) does not say anything about the raster data generating process in the RIP system (1009). Consequently, Notredame also discloses that the post ripping process is part of the rapid merge system (1003) and not of the raster data generating process in the RIP systems (1009) (column 35 lines 46 to 60). Therefore, Notredame explicitly discloses that the memory in the rapid merge system (1003) that is part of the computer system (110) in Fig. 1, is not part of the RIP system, instead, it is the page element cache and page element storage of the rapid merge system (1003).

Also, Fig. 10 of Notredame shows that page layout script data is sent to the page element cache (1011) in the rapid merge system (1003). Apparently, the page layout script data influences the compressed raster image data provided by the RIP system in the rapid merge system (1003). However, the raster data process in a RIP system is not influenced by any page layout script data, which is another indication that the

storage in the rapid merge system (1003) is not part of the RIP system.

It is again noted that the storage process described in column 35, lines 50 to 52 of Notredame, concerning raster data being arranged column by column is only directed to the rapid merge system (1003). Accordingly, this is data that is stored and convened from a RIP system file after the RIP process is already completed. According to page 5, lines 13 to 16 of the specification of the instant application, the raster memory is defined as storage where the raster processor stores the raster data column by column. Thus, the raster processor stores raster data column by column in the raster memory while generating the raster data.

What happens next to the file that is stored in the raster memory is not a part of the present invention. However, Notredame explicitly discloses that the raster data coming from the RIP system (1009) are already sent as a file to the rapid merge system (1003). Because Notredame discloses that a file that is sent to the rapid merge system (1003), the data cannot be stored for the first time in the rapid merge system (1003). Notredame discloses that the file is generated first in the storage of the RIP system (1009). However, Notredame

is silent as to how this file this generated or stored in the RIP system (1009).

As seen from the above-given remarks, the reference does not show storing the raster data column by column in a raster memory with random access while being generated by the raster processor as recited in claims 1 and 7 of the instant application.

Since independent claims 1 and 7 are believed to be allowable, dependent claims 4, 5, 8, and 9 are believed to be allowable as well.

In the fourth paragraph on page 4 of the above-identified Office action, claims 2, 3, and 6 have been rejected as being obvious over Notredame (U.S. Patent No. 6,049,390) in view of Agarwal (U.S. Patent Publication No. 2001/0022815 A1) under 35 U.S.C. § 103. Agarwal does not make up for the deficiencies of Notredame. Since claim 1 is believed to be allowable, dependent claims 2, 3, and 6 are believed to be allowable as well.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claims 1 or 7. Claims 1 and 7

are, therefore, believed to be patentable over the art and since all of the dependent claims are ultimately dependent on claims 1 or 7, they are believed to be patentable as well.

In view of the foregoing, reconsideration and allowance of claims 1-9 are solicited.

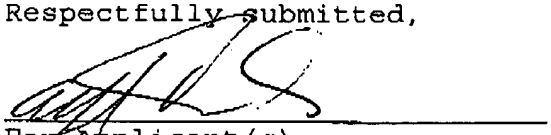
In the event the Examiner should still find any of the claims to be unpatentable, counsel respectfully requests a telephone call so that, if possible, patentable language can be worked out.

If an extension of time for this paper is required, petition for extension is herewith made.

Applic. No. 10/075,670
Amdt. dated January 16, 2007
Reply to Office action of October 16, 2006

Please charge any other fees which might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner Greenberg Stemer LLP, No. 12-1099.

Respectfully submitted,



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